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From: Carmine Vasile
Sent: Fri 2/24/2017 4:17:42 PM
Subject: Erroneous 2017 PAG Manual Re: REMM Update

To whom it may concern: The 2017 PAG Manual cited in your email below is based on erroneous DRLs derived by EPA contractors for over 200 naturally occurring & manmade radionuclides. It is also incomplete because there are no DRLs for Radium-226's daughter, Radon-222, or its decay products, with the exception of erroneous values for Bismuth-210 and Polonium-210.

Consequently, it is impossible for FEMA to calculate a non-emergency PAG for any tap water before or after an emergency that is contaminated by Radon gas that would be consistent with the Computer Model used by my State Health Department, as discussed in the NYSDOH letter @ www.gfxtechnology.com/Cuomo.pdf. This letter shows my Health Department would use the following equation to calculate a Rn-222 PAG: $4.1((\text{DRL-222})/387) = 0.01 (\text{DRL-222})$ mrem/yr, where DRL-222 is the measured concentration of Rn-222 gas.

But there is no similar equation in the PAG Manual even though test results for tap, bottled, irrigation & well water show Rn-222 concentrations can exceed 20,000 pCi/L. The latter concentration corresponds to a PAG-222 level exceeding 200 mrem/yr from only Radon-222 and its 7 radioactive decay products: Po-218, Pb-214, Bi-214, Po-214, Pb-210, Bi-210 & Po-210.

Additionally, the PAG Manual's Sum of the Fractions example on page 65 is wrong, as indicated in my Objection @ www.gfxtechnology.com/PAG.pdf. Since the FDA does not regulate Radon in bottled water, contrary to the EPA's response to my Objection, the FDA must be prohibited from using the Water PAGs in the 2017 PAG Manual.

Please ask the new EPA Administrator to make the necessary corrections and include DRLs for all radionuclides to facilitate accurate PAG calculations for water contaminated by multiple radionuclides. Until such time, you must not advise health officials to rely on the 2017 version of the PAG Manual.

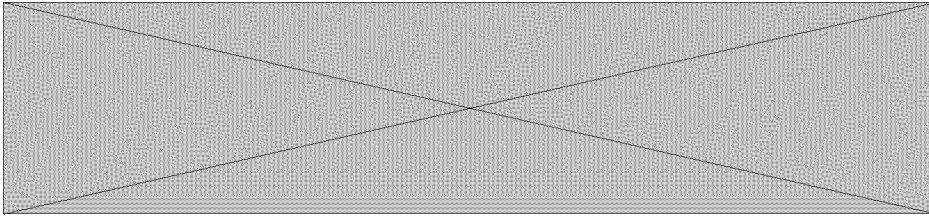
Yours truly,
Dr. Carmine F. Vasile

Ex. 6 - Personal Privacy

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Sent from myMail for Android

Thursday, 23 February 2017, 10:05AM -05:00 from Radiation Emergency Medical Management
NLMREMM@public.govdelivery.com:



Dear REMM User,

Since the last REMM update in August, 2016, the US government has released several very important documents. We have incorporated them into REMM and wanted to let you know. To find them easily, visit the "[What's New on REMM?](#)"

They are also listed here:

- **PAG Manual: Protective Action Guides and Planning Guidance for Radiological Incidents, EPA-400/R-17/001 (PDF - 1.48 MB) (EPA, January 2017)** EPA released the final version of this guidance in January 2017.
- **Health and Safety Planning Guide - For Planners, Safety Officers, and Supervisors for Protecting Responders Following a Nuclear Detonation (US Government Interagency, December 2016)**
- **Nuclear/Radiological Incident Annex to the Response and Recovery Federal Interagency Operations Plan (PDF - 3.38 MB) (US Government Interagency, October 2016)**

The REMM Team has made other key updates to REMM, and we will continue to do so.

An update to Mobile REMM is also coming soon.

Thank you for your ongoing support.

The REMM Team



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